

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

| | | |
|--|---|--|
| _____ |) | |
| In re: |) | Chapter 11 |
| |) | |
| MERCY HOSPITAL, IOWA CITY, IOWA, <i>et al.</i> , |) | Case No. 23-00623 (TJC) |
| |) | |
| Debtors. |) | (Jointly Administered) |
| |) | |
| _____ |) | Objections Due: August 13, 2024 at 4:00 p.m. |
| | | Hearing Date: <i>Only if objections are filed</i> |

**EIGHTH MONTHLY APPLICATION OF SILLS CUMMIS & GROSS P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

| | |
|---|--|
| Name of Applicant: | <u>Sills Cummis & Gross P.C.</u> |
| Authorized to provide professional services to: | <u>Official Committee of Unsecured Creditors</u> |
| Date of Retention: | <u>October 12, 2023 <i>effective as of</i> August 18, 2023</u> |
| Period for which compensation and reimbursement are sought: | <u>March 1, 2024 – March 31, 2024</u> |
| Amount of compensation sought as actual, reasonable, and necessary: | <u>\$144,126.00 (80% of \$180,157.50)</u> |
| Amount of expense reimbursement sought as actual, reasonable, and necessary: | <u>\$5,459.76</u> |

This is a monthly application.

COMPENSATION BY PROFESSIONAL

| Name of Professional Individual | Position, Department, Year of First Bar Admission | Hourly Billing Rate¹ | Total Hours Billed | Total Compensation |
|--|--|--|---------------------------|---------------------------|
| Andrew Sherman | Member, Bankruptcy First Bar Admission: 1991 | \$1,075 | 43.6 | \$46,870.00 |
| Boris Mankovetskiy | Member, Bankruptcy First Bar Admission: 2001 | \$925 | 75.3 | \$69,652.50 |
| S. Jason Teele | Member, Bankruptcy First Bar Admission: 2001 | \$895 | 16.2 | \$14,499.00 |
| Michael Savetsky | Of Counsel, Bankruptcy First Bar Admission: 2005 | \$835 | 92.2 | \$76,987.00 |
| Gregory A. Kopacz | Of Counsel, Bankruptcy First Bar Admission: 2010 | \$775 | 10.0 | \$7,750.00 |
| Oleh Matviyishyn | Associate, Bankruptcy First Bar Admission: 2022 | \$425 | 29.6 | \$12,580.00 |
| Total Fees at Standard Rates | | | 266.9 | \$228,338.50 |
| Total Fees at \$675 Blended Hourly Rate² | | | 266.9 | \$180,157.50 |

¹ Effective October 1, 2023 (the first day of Sills’ fiscal year), the *standard* hourly rates of certain Sills attorneys were increased to reflect the increased experience and seniority of such attorneys, as well as economic and other conditions. For instance, the hourly rate of Andrew H. Sherman was increased from \$995 to \$1,075; the hourly rate of Boris Mankovetskiy was increased from \$875 to \$925; the hourly rate of Jason Teele was increased from \$850 to \$895; the hourly rate of Michael Savetsky was increased from \$795 to \$835; and the hourly rate of Gregory Kopacz was increased from \$725 to \$775. However, as discussed below, Sills’ attorneys’ fees for *this* engagement are subject to a \$675 blended hourly rate cap.

² As noted in Sills’ retention application [Docket No. 228] (the “Retention Application”), “Sills fees (not including expenses) will be limited to the lesser of (i) the amount of Sills’ fees at its professionals’ standard rates . . . and (ii) the amount of Sills’ fees at a blended hourly rate of \$675.” See Retention Application ¶ 16.

COMPENSATION BY PROJECT CATEGORY

| Project Category | Total Hours | Total Fees |
|---|--------------------|---------------------|
| Asset Analysis and Recovery (101) | 0.7 | \$647.50 |
| Asset Disposition (102) | 7.6 | \$6,879.00 |
| Case Administration (104) | 5.4 | \$4,077.00 |
| Claims Administration and Objections (105) | 2.1 | \$1,927.50 |
| Fee/Employment Applications (107) | 15.9 | \$9,979.50 |
| Fee/Employment Objections (108) | 0.5 | \$387.50 |
| Financing (109) | 17.6 | \$12,692.00 |
| Litigation (Other than Avoidance Action Litigation) (110) | 16.4 | \$12,426.00 |
| Plan and Disclosure Statement (113) | 180.4 | \$159,996.00 |
| Relief from Stay Proceedings (114) | 8.3 | \$7,026.50 |
| Travel (billed at 50%) (116) | 12.0 | \$12,300.00 |
| Total Fees at Standard Rate | 266.9 | \$228,338.50 |
| Total Fees at \$675 Blended Rate¹ | 266.9 | \$180,157.50 |

EXPENSE SUMMARY

| Expense Category | Total Expenses |
|-------------------------|-----------------------|
| Pacer | \$30.50 |
| Meals | \$261.21 |
| Lodging | \$541.68 |
| Travel | \$4,626.37 |
| TOTAL | \$5,459.76 |

¹ Sills' attorneys' fees are subject to a blended hourly rate cap of \$675. See Retention Application ¶ 16.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623 (TJC)

(Jointly Administered)

Objections Due: August 13, 2024 at 4:00 p.m.
Hearing Date: *Only if objections are filed*

**EIGHTH APPLICATION OF SILLS CUMMIS & GROSS P.C.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD FROM MARCH 1, 2024 THROUGH MARCH 31, 2024**

Pursuant to Bankruptcy Code sections 330 and 331, Federal Rule of Bankruptcy Procedure 2016 (the “Bankruptcy Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 224] (the “Compensation Order”), Sills Cummis & Gross P.C. (“Sills”) files this *Eighth Application for Allowance of Compensation for Services Rendered as Counsel to the Official Committee of Unsecured Creditors for the Period From March 1, 2024 Through March 31, 2024* (the “Application”), seeking allowance of \$144,126.00 (80% of \$180,157.50) in fees *plus* \$5,459.76 for reimbursement of actual and necessary expenses, for a total of \$149,585.76.

Background

1. On August 7, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.
2. On August 15, 2023, the U.S. Trustee formed the Committee [Docket. No. 107].
3. The Committee retained Sills as co-counsel pursuant to this Court’s *Order Granting Application to Retain and Employ Sills Cummis & Gross P.C. as Co-Counsel for the Official Committee of Unsecured Creditors, Effective as of August 18, 2022* [Docket No. 355].

Compensation Paid and Its Source

4. All services for which compensation is requested were performed for or on behalf of the Committee. During the compensation period, Sills received no payment and no promises for payment from any source other than the Debtors for services to be rendered in any capacity in connection with the matters covered by this Application. There is no agreement or understanding between Sills and any other person, other than with the members, of counsel and associates of the firm, for the sharing of compensation to be received in these cases.

Fee Statements

5. The fee statement for this period is attached as **Exhibit A**. To the best of Sills' knowledge, this Application reasonably complies with Bankruptcy Code sections 330 and 331, the Bankruptcy Rules, the *Guidelines for Reviewing Applications for Compensation and Reimbursement for Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective November 1, 2013*, and the Compensation Order.

Summary of Services by Project

A. Asset Analysis and Recovery

Fees: \$647.50; Total Hours: 0.7

This category includes time spent analyzing a proposed stipulated stay relief order.

B. Asset Disposition

Fees: \$6,879.00; Total Hours: 7.6

This category includes time spent: (a) analyzing and addressing matters related to the disposition of the Debtors' joint venture interests and communicating with the Debtors' professionals; (b) analyzing a motion seeking to distribute sale proceeds, preparing an objection thereto, and conducting related research; and (c) analyzing post-closing sale obligations.

C. Case Administration

Fees: \$4,077.00; Total Hours: 5.4

This category includes time spent: (a) attending a status conference; (b) preparing updates for the Committee members and attending Committee meetings; and (c) reviewing and analyzing motions, pleadings, and other court filings.

D. Claims Administration and Objections

Fees: \$1,927.50; Total Hours: 2.1

This category includes time spent: (a) analyzing pension claims; and (b) reviewing an objection regarding the proposed wind-down of worker compensation policies.

E. Fee/Employment Applications

Fees: \$9,979.50; Total Hours: 15.9

This category includes time spent: (a) working on Sills' January and February fee applications; (b) drafting a supplemental declaration in support of Sills' retention application; and (c) communicating with Debtor's counsel and the Committee's other advisors regarding the foregoing and other matters.

F. Fee/Employment Objections

Fees: \$387.50; Total Hours: 0.5

This category includes time spent reviewing the Debtors' professionals' fee applications and objections thereto.

G. Financing

Fees: \$12,692.00; Total Hours: 17.6

This category includes time spent addressing cash collateral and "challenge" matters, including preparing a cash collateral objection and conducting related research and analysis.

H. Litigation (Other than Avoidance Action Litigation)

Fees: \$12,426.00; Total Hours: 16.4

This category includes time spent preparing an adversary proceeding complaint and conducting related research and analysis.

I. Plan and Disclosure Statement

Fees: \$159,996.00; Total Hours: 180.4

This category includes time spent: (a) conducting research and analysis regarding the Debtors' proposed chapter 11 plan, disclosure statement, solicitation procedures motion, and plan support agreement; (b) drafting a disclosure statement objection and conducting related research and analysis; (c) engaging in settlement discussions with key case constituencies and addressing related matters, including mediation matters; (d) preparing for and attending related hearings and conferences; and (e) communicating with key case constituencies, including the Committee members, the Committee's other advisors, Debtors' counsel, Preston Hollow's counsel, and the Pension Committee's counsel, regarding the foregoing and related matters.

J. Relief from Stay Proceedings

Fees: \$7,026.50; Total Hours: 8.3

This category includes time spent: (a) analyzing stay relief motions; and (b) preparing an objection to a motion seeking stay relief.

K. Travel (billed at 50%)

Fees: \$12,300.00; Total Hours: 12.0

This category includes time spent traveling to Cedar Rapids for hearings/court conferences.

Conclusion

6. Sills submits the amounts sought are fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of services rendered, (d) the value

of such services, and (e) the costs of comparable services other than in a case under this title.

WHEREFORE, Sills requests an allowance be made to Sills in the amount of \$144,126.00 (80% of \$180,157.50), as compensation for services rendered, *plus* \$5,459.76 for reimbursement of actual and necessary expenses, for a total of \$149,585.76, and that such amount be authorized for payment.

Dated: July 30, 2024
Cedar Rapids, Iowa

Respectfully submitted,

/s/ Andrew H. Sherman

Andrew H. Sherman, NJS Bar No. 042731991

(admitted *pro hac vice*)

Boris I. Mankovetskiy, NJS Bar No. 012862001

(admitted *pro hac vice*)

SILLS CUMMIS & GROSS, P.C.

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bmankovetskiy@sillscummis.com

-and-

/s/ Robert C. Gainer

Robert C. Gainer IS9998471

CUTLER LAW FIRM, P.C.

1307 50th Street

West Des Moines, Iowa 50266

Telephone: 515-223-6600

Facsimile: 515-223-6787

E-mail: rgainer@cutlerfirm.com

*Attorneys for The Official Committee of Unsecured
Creditors of Mercy Hospital, Iowa City, Iowa, et al.*

Certificate of Service

The undersigned certifies, under penalty of perjury, that on this July 30, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case

/s/ Stephanie Newton

Sills Cummis & Gross
A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, NJ 07102-5400
(973) 643-7000

Official Unsecured Creditors Committee of Mercy Hospital
c/o Steindler Orthopedic Clinic, Committee Chair
Attn: Edward Patrick Magallanes, President and CEO
222 W. Merchandise Mart Plaza #2024
2751 Northgate Drive
Iowa City, IA 52245

May 1, 2024
Client/Matter No. 08650147.000001
Invoice: 2057909
Billing Attorney: AHS
Federal Tax Id: 22-1920331

RE: Creditors' Committee

For Legal Services Rendered Through March 31, 2024

| | | | | HOURS | AMOUNT |
|--|----|-----|---|-------------|-----------------|
| 101 – ASSET ANALYSIS AND RECOVERY | | | | | |
| 03/28/24 | BM | 101 | Analysis regarding proposed stipulated order regarding ICASC's motion for relief from the stay. | 0.70 | |
| TASK TOTAL 101 | | | | 0.70 | \$647.50 |
| 102 – ASSET DISPOSITION | | | | | |
| 03/13/24 | BM | 102 | Analysis regarding disposition of JV interests. | 0.90 | |
| 03/13/24 | BM | 102 | Call with H2C and Debtors' counsel regarding JV sale process. | 1.00 | |
| 03/14/24 | JT | 102 | Review/revise objection to distribution motion. | 0.80 | |
| 03/14/24 | JT | 102 | Telephone conference with B. Mankovetskiy re: challenge deadline, distribution motion, mediation, disclosure statement and cash collateral. | 0.30 | |
| 03/15/24 | JT | 102 | Review revised draft of objection to distribution motion. | 0.60 | |

Creditors' Committee

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| | | | | HOURS | AMOUNT |
|----------------|----|-----|--|-------------|-------------------|
| 03/19/24 | BM | 102 | Analysis and revisions of draft objection to motion to distribute sale proceeds. | 0.70 | |
| 03/19/24 | BM | 102 | Analysis regarding University's post-closing obligations. | 0.90 | |
| 03/19/24 | OM | 102 | Update Objection to Distribution Motion pursuant to comments from M. Savetsky. | 0.20 | |
| 03/22/24 | BM | 102 | Analysis regarding objection to motion of Iowa City Ambulatory Surgical Center and bondholders' joinder. | 0.60 | |
| 03/25/24 | BM | 102 | Analysis regarding objection to bondholders' motion to distribute sale proceeds. | 0.90 | |
| 03/26/24 | BM | 102 | Analysis regarding disposition of JV interests. | 0.70 | |
| TASK TOTAL 102 | | | | <u>7.60</u> | <u>\$6,879.00</u> |

104 – CASE ADMINISTRATION

| | | | | | |
|----------|----|-----|---|------|--|
| 03/05/24 | BM | 104 | Attend status conference. | 0.80 | |
| 03/12/24 | OM | 104 | Review docket, update critical dates calendar, and circulate same to team with reminders. | 0.50 | |
| 03/18/24 | JT | 104 | Review critical dates and dockets. | 0.60 | |
| 03/20/24 | BM | 104 | Prepare Committee update. | 0.60 | |
| 03/22/24 | OM | 104 | Review docket, update critical dates calendar, and circulate same to team with reminders. | 0.30 | |
| 03/25/24 | BM | 104 | Attend Committee meeting. | 0.30 | |
| 03/26/24 | BM | 104 | Prepare an update for Committee. | 0.60 | |

Creditors' Committee

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| | | | | HOURS | AMOUNT |
|--|-----|-----|--|-------------|-------------------|
| 03/26/24 | OM | 104 | Review docket and objection pleadings pertaining to March 27 omnibus hearing and update critical dates calendar for team regarding same. | 0.80 | |
| 03/28/24 | BM | 104 | Prepare an update for Committee. | 0.70 | |
| 03/31/24 | OM | 104 | Review docket, update critical dates calendar, and circulate same to team with reminders. | 0.20 | |
| TASK TOTAL 104 | | | | <u>5.40</u> | <u>\$4,077.00</u> |
| 105 – CLAIMS ADMINISTRATION AND OBJECTIONS | | | | | |
| 03/16/24 | GAK | 105 | Review insurer objection to proposed wind-down of Workers Comp policies. | 0.10 | |
| 03/22/24 | BM | 105 | Analysis regarding Pension Plan claims. | 0.80 | |
| 03/27/24 | BM | 105 | Analysis regarding pension underfunding issues and related claims. | 1.20 | |
| TASK TOTAL 105 | | | | <u>2.10</u> | <u>\$1,927.50</u> |
| 107 – FEE/EMPLOYMENT APPLICATIONS | | | | | |
| 03/11/24 | GAK | 107 | Begin preparing January fee application. | 0.90 | |
| 03/12/24 | GAK | 107 | Communications with A. Sherman regarding fee statement. | 0.10 | |
| 03/12/24 | GAK | 107 | Work on January fee statement. | 2.40 | |
| 03/13/24 | GAK | 107 | Communications with local counsel and A. Sherman regarding fee application. | 0.10 | |

Creditors' Committee

May 1, 2024
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| | | | | HOURS | AMOUNT |
|----------|-----|-----|--|-------|--------|
| 03/18/24 | GAK | 107 | Communications with O. Matviyishyn regarding fee statements. | 0.20 | |
| 03/18/24 | OM | 107 | Begin February monthly fee application. | 0.60 | |
| 03/18/24 | OM | 107 | Draft email to Debtor's counsel of breakdown of fees owed to Sills. | 0.20 | |
| 03/18/24 | OM | 107 | Review docket for compensation orders in preparation of summary to determine paid and unpaid amounts thereto. | 1.30 | |
| 03/18/24 | OM | 107 | Correspondence with G. Kopacz re: fee applications and approved fees. | 0.10 | |
| 03/21/24 | JT | 107 | Review/revise supplemental disclosure. | 0.60 | |
| 03/21/24 | GAK | 107 | Revise supplemental declaration. | 0.30 | |
| 03/21/24 | GAK | 107 | Work on supplemental declaration. | 2.20 | |
| 03/21/24 | GAK | 107 | Finalize declaration for filing. | 0.10 | |
| 03/21/24 | GAK | 107 | Attention to February fee statement. | 0.20 | |
| 03/21/24 | OM | 107 | Review edits from A. Sherman pertaining to the supplemental declaration and provide further feedback re: same. | 0.20 | |
| 03/21/24 | OM | 107 | Correspondence with G. Kopacz re: supplemental declaration disclosing conflicts. | 0.20 | |
| 03/21/24 | OM | 107 | Draft supplemental declaration disclosing connections. | 1.40 | |
| 03/22/24 | OM | 107 | Continue working on Mercy February fee application. | 1.20 | |

Creditors' Committee

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| | | | | HOURS | AMOUNT |
|----------------|-----|-----|--|--------------|-------------------|
| 03/26/24 | OM | 107 | Finalize February fee application and circulate to G. Kopacz for review. | 1.70 | |
| 03/27/24 | GAK | 107 | Work on February fee statement. | 1.90 | |
| TASK TOTAL 107 | | | | <u>15.90</u> | <u>\$9,979.50</u> |

108 – FEE/EMPLOYMENT OBJECTIONS

| | | | | | |
|----------------|-----|-----|--|-------------|-----------------|
| 03/11/24 | GAK | 108 | Review MWE December and January fee applications. | 0.20 | |
| 03/16/24 | GAK | 108 | Review Debtors' professionals' fee applications. | 0.10 | |
| 03/22/24 | GAK | 108 | Review UST objections to MWE fee applications. | 0.10 | |
| 03/29/24 | GAK | 108 | Review UST objection to H2C final fee application. | 0.10 | |
| TASK TOTAL 108 | | | | <u>0.50</u> | <u>\$387.50</u> |

109 – FINANCING

| | | | | | |
|----------|----|-----|---|------|--|
| 03/08/24 | JT | 109 | Research re: marshalling re: remedies for adversary proceeding. | 0.80 | |
| 03/14/24 | JT | 109 | Email O. Matviyishyn and M. Savetsky re: PH complaint and cash collateral. | 0.40 | |
| 03/14/24 | JT | 109 | Review prior cash collateral objection. | 0.70 | |
| 03/14/24 | JT | 109 | Research re: 506(c) and 552(b) waivers. | 1.20 | |
| 03/14/24 | JT | 109 | Review cash collateral orders and stipulation. | 0.80 | |
| 03/14/24 | MS | 109 | Emails with J. Teele and O. Matviyishyn re: objection to final cash collateral order. | 0.20 | |

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| | | | | HOURS | AMOUNT |
|----------|----|-----|---|-------|--------|
| 03/14/24 | OM | 109 | Email correspondence with J. Teele re: supplemental cash collateral objection. | 0.10 | |
| 03/14/24 | OM | 109 | Begin drafting supplemental cash collateral objection pertaining to section 506(c) and 552(b) of the Bankruptcy Code. | 0.80 | |
| 03/15/24 | JT | 109 | Review revised draft of cash collateral objection. | 0.50 | |
| 03/15/24 | OM | 109 | Review M. Savetsky edits to distribution motion and correspondence and feedback with J. Teele and M. Savetsky re: same. | 0.40 | |
| 03/15/24 | OM | 109 | Review edits from J. Teele on supplemental cash collateral objection and make further edits to said objection pursuant thereof. | 0.50 | |
| 03/15/24 | OM | 109 | Draft supplemental objection to cash collateral. | 3.70 | |
| 03/15/24 | OM | 109 | Correspondence with J. Teele re: supplemental objection to cash collateral. | 0.20 | |
| 03/18/24 | JT | 109 | Review revised cash collateral objection. | 0.80 | |
| 03/18/24 | MS | 109 | Emails with B. Mankovetskiy re: objection to final cash collateral order. | 0.10 | |
| 03/18/24 | MS | 109 | Review and revise objection to final cash collateral order. | 0.90 | |
| 03/18/24 | MS | 109 | Call with O. Matviyishyn re: objection to final cash collateral order. | 0.10 | |
| 03/18/24 | OM | 109 | Make edits to supplemental cash collateral objection pursuant to correspondence with M. Savetsky. | 0.30 | |

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| | | | | HOURS | AMOUNT |
|----------------|----|-----|--|-------|-------------|
| 03/18/24 | OM | 109 | Correspondence with M. Savetsky re: supplemental cash collateral objection. | 0.30 | |
| 03/19/24 | BM | 109 | Analysis and revisions of draft complaint against Computershare and PH. | 1.10 | |
| 03/19/24 | BM | 109 | Analysis regarding supplemental objection to proposed final cash collateral order. | 0.80 | |
| 03/19/24 | MS | 109 | Review and revise objection to final cash collateral order. | 1.50 | |
| 03/19/24 | MS | 109 | Call with B. Mankovetskiy re: objection to final cash collateral order and emails with B. Mankovetskiy re: same. | 0.20 | |
| 03/20/24 | JT | 109 | Office conference with A. Sherman and B. Mankovetskiy re: extended challenge deadline. | 0.40 | |
| 03/25/24 | BM | 109 | Analysis regarding supplemental objection to final cash collateral order. | 0.80 | |
| TASK TOTAL 109 | | | | 17.60 | \$12,692.00 |

110 – LITIGATION (OTHER THAN AVOIDANCE ACTION LITIGATION)

| | | | | | |
|----------|----|-----|---|------|--|
| 03/04/24 | OM | 110 | Correspondence with A. Sherman and B. Mankovetskiy re: research pertaining to standing of Debtors to settle claims. | 0.20 | |
| 03/05/24 | OM | 110 | Review and implement comments from A. Sherman re: Exide summary. | 0.10 | |

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| | | | | HOURS | AMOUNT |
|----------|----|-----|---|-------|--------|
| 03/05/24 | OM | 110 | Draft summary of research re: Debtor's standing jurisdiction to settle adversary proceeding and circulate to B. Mankovetskiy and A. Sherman for review. | 0.70 | |
| 03/05/24 | OM | 110 | Research Debtor's jurisdiction to settle adversary proceeding pursuant to instructions from A. Sherman. | 2.30 | |
| 03/13/24 | MS | 110 | Review and revise draft lien challenge complaint. | 0.20 | |
| 03/14/24 | JT | 110 | Review/revise complaint against Preston Hollow. | 1.60 | |
| 03/14/24 | MS | 110 | Review and revise draft lien challenge complaint. | 4.80 | |
| 03/14/24 | MS | 110 | Emails with J. Teele draft lien challenge complaint. | 0.20 | |
| 03/14/24 | MS | 110 | Draft email to B. Gainer re: revised draft lien challenge complaint. | 0.10 | |
| 03/14/24 | OM | 110 | Correspondence with J. Teele re: distribution motion and adversary complaint and circulate same to J. Teele and M. Savetsky. | 0.20 | |
| 03/14/24 | OM | 110 | Correspondence with J. Teele and M. Savetsky re: supplemental cash collateral objection. | 0.30 | |
| 03/14/24 | OM | 110 | Correspondence with B. Mankovetskiy re: cash collateral 506(c) waiver. | 0.10 | |
| 03/15/24 | MS | 110 | Review email from B. Gainer re: revised draft lien challenge complaint and court conference on March 18. | 0.10 | |
| 03/18/24 | JT | 110 | Review/revise 506(c) claims in complaint. | 1.10 | |

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| | | | | HOURS | AMOUNT |
|-----------------------|----|-----|--|--------------|--------------------|
| 03/19/24 | JT | 110 | Review/revise updated complaint vs Master Trustee. | 1.40 | |
| 03/19/24 | MS | 110 | Review and revise draft lien challenge complaint. | 1.30 | |
| 03/19/24 | MS | 110 | Confer with B. Mankovetskiy re: draft lien challenge complaint and emails with B. Mankovetskiy re: same. | 0.20 | |
| 03/25/24 | BM | 110 | Analysis regarding adversary proceeding complaint against bondholders' representatives. | 1.40 | |
| 03/25/24 | OM | 110 | Correspondence with M. Savetsky re: objection to distribution motion. | 0.10 | |
| TASK TOTAL 110 | | | | 16.40 | \$12,426.00 |

113 – PLAN AND DISCLOSURE STATEMENT

| | | | | | |
|----------|-----|-----|---|------|--|
| 02/27/24 | BM | 113 | Analysis and revisions of letter to stakeholders regarding plan issues and request for a status conference. | 1.40 | |
| 03/01/24 | BM | 113 | Analysis regarding potential global plan settlement. | 1.10 | |
| 03/04/24 | BM | 113 | Call with Debtors, PH and Pensioners' counsel regarding potential mediation. | 0.50 | |
| 03/04/24 | AHS | 113 | Call with counsel for Debtors, PH and pension committee re: plan issues and upcoming status conference. | 0.50 | |
| 03/04/24 | JT | 113 | Office conference with A. Sherman re: potential mediation. | 0.30 | |
| 03/04/24 | GAK | 113 | Review Debtors' motion to approve DS and approve solicitation procedures. | 0.30 | |
| 03/04/24 | MS | 113 | Legal research re: plan issues. | 0.30 | |

Creditors' Committee

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Invoice: 2057909
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| | | | | HOURS | AMOUNT |
|----------|-----|-----|---|-------|--------|
| 03/05/24 | BM | 113 | Analysis regarding revisions of proposed filed plan of liquidation. | 1.30 | |
| 03/05/24 | BM | 113 | Calls with counsel to PH and Debtors' regarding settlement conference. | 0.60 | |
| 03/05/24 | BM | 113 | Analysis regarding Committee's settlement proposal to Debtors and PH. | 1.20 | |
| 03/05/24 | AHS | 113 | Prepare for and attend hearing regarding status conference on plan issues and alternative dispute resolution process. | 1.20 | |
| 03/05/24 | AHS | 113 | Follow up emails to counsel re: document requests and upcoming conference issues. | 0.70 | |
| 03/05/24 | AHS | 113 | Call with counsel for Preston Hollow re: upcoming court conference and plan issues. | 0.30 | |
| 03/05/24 | AHS | 113 | Calls with FTI re: upcoming conference and plan issues. | 0.40 | |
| 03/05/24 | AHS | 113 | Call with committee member and email to committee re: plan and upcoming court conference. | 0.40 | |
| 03/05/24 | GAK | 113 | Review Debtors' motion to extend Plan exclusivity periods. | 0.10 | |
| 03/05/24 | MS | 113 | Review plan settlement term sheet. | 0.50 | |
| 03/06/24 | BM | 113 | Analysis regarding revisions of Debtors' proposed plan of liquidation. | 1.20 | |
| 03/06/24 | BM | 113 | Analysis of issues regarding settlement conference. | 1.10 | |
| 03/06/24 | AHS | 113 | Analysis re: plan issues, JV valuation and case law re: disparate plan treatment and fair and equitable issues. | 0.80 | |

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|----------|-----|-----|--|-------|--------|
| 03/06/24 | MS | 113 | Review and revise Debtors' proposed chapter 11 plan. | 5.20 | |
| 03/07/24 | BM | 113 | Analysis of issues regarding potential plan settlement. | 0.70 | |
| 03/07/24 | MS | 113 | Review and revise Debtors' proposed chapter 11 plan. | 6.10 | |
| 03/08/24 | BM | 113 | Analysis of issues regarding settlement conference and revisions of proposed plan of liquidation. | 1.20 | |
| 03/08/24 | AHS | 113 | Email to counsel re: plan support agreement, H2C JV update. | 0.20 | |
| 03/08/24 | AHS | 113 | Review of case law and analysis re: apparent plan support agreement. | 0.70 | |
| 03/08/24 | MS | 113 | Call with B. Mankovetskiy re: proposed revisions to proposed chapter 11 plan and disclosure statement objection. | 0.20 | |
| 03/08/24 | MS | 113 | Review and further revise Debtors' proposed chapter 11 plan. | 4.70 | |
| 03/08/24 | MS | 113 | Emails to B. Mankovetskiy re: Debtors' proposed chapter 11 plan. | 0.40 | |
| 03/08/24 | MS | 113 | Call with A. Sherman re: Debtors' proposed chapter 11 plan. | 0.10 | |
| 03/08/24 | MS | 113 | Call with B. Mankovetskiy re: Debtors' proposed chapter 11 plan. | 0.20 | |
| 03/11/24 | BM | 113 | Analysis regarding Debtors' plan support agreement. | 0.60 | |
| 03/11/24 | BM | 113 | Call with FTI regarding settlement conference issues. | 0.40 | |
| 03/11/24 | GAK | 113 | Review Debtors' motion and related order regarding expedited conference. | 0.10 | |

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| | | | | HOURS | AMOUNT |
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| 03/11/24 | MS | 113 | Review and revise comments on plan of liquidation. | 2.20 | |
| 03/11/24 | MS | 113 | Calls with B. Mankovetskiy re: revisions to plan of liquidation. | 0.50 | |
| 03/12/24 | AHS | 113 | Review and circulate draft combined plan and disclosure statement and email to committee re: same. | 0.70 | |
| 03/12/24 | MS | 113 | Review cases re: plan related research. | 0.20 | |
| 03/12/24 | MS | 113 | Confer with O. Matviyishyn re: plan related research. | 0.20 | |
| 03/12/24 | MS | 113 | Being drafting disclosure statement objection. | 1.30 | |
| 03/12/24 | MS | 113 | Review solicitation procedures motion. | 0.70 | |
| 03/12/24 | MS | 113 | Draft email to B. Mankovetskiy re: plan injunction, third party release and ballot opt out. | 0.20 | |
| 03/12/24 | MS | 113 | Review plan injunction, third party release and ballot opt out. | 0.40 | |
| 03/12/24 | MS | 113 | Call with B. Mankovetskiy re: amendment to schedules and late claim. | 0.10 | |
| 03/12/24 | MS | 113 | Research bankruptcy and local rules re: amendment to schedules and late claim. | 0.30 | |
| 03/12/24 | MS | 113 | Review schedules and claims register re: pension plan claims. | 0.30 | |
| 03/12/24 | MS | 113 | Research re: enforceability of Plan Support Agreement. | 0.80 | |
| 03/12/24 | MS | 113 | Review Plan Support Agreement. | 0.80 | |
| 03/12/24 | MS | 113 | Confer with B. Mankovetskiy and A. Sherman re: plan of liquidation. | 0.10 | |

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| | | | | HOURS | AMOUNT |
|----------|----|-----|---|-------|--------|
| 03/12/24 | MS | 113 | Review and further revise plan of liquidation. | 2.10 | |
| 03/12/24 | OM | 113 | Research third-party release factors pertaining to the Committee's draft objection to the disclosure statement. | 0.60 | |
| 03/13/24 | BM | 113 | Analysis regarding plan revisions and potential resolution of Committee's objections. | 1.20 | |
| 03/13/24 | MS | 113 | Calls with O. Matviyishyn re: research for disclosure statement objection. | 0.20 | |
| 03/13/24 | MS | 113 | Confer with O. Matviyishyn re: research for disclosure statement objection and review email from O. Matviyishyn re: same. | 0.20 | |
| 03/13/24 | MS | 113 | Emails with O. Matviyishyn re: plan related research. | 0.20 | |
| 03/13/24 | MS | 113 | Call with B. Mankovetskiy re: disclosure statement objection. | 0.10 | |
| 03/13/24 | MS | 113 | Confer with B. Mankovetskiy re: preparation for court status conference re: plan and call with B. Mankovetskiy re: same. | 0.30 | |
| 03/13/24 | MS | 113 | Further review of solicitation procedures motion, order and exhibits. | 0.50 | |
| 03/13/24 | MS | 113 | Draft disclosure statement objection. | 4.40 | |
| 03/13/24 | OM | 113 | Finalize Eighth Circuit third-party release research and provide summary to M. Savetsky. | 1.30 | |
| 03/13/24 | OM | 113 | Draft patently unconfirmable legal standard for use in objection to the disclosure statement. | 0.70 | |

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| | | | | HOURS | AMOUNT |
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| 03/13/24 | OM | 113 | Additional correspondence with M. Savetsky re: patently unconfirmable plan research. | 0.10 | |
| 03/13/24 | OM | 113 | Research "patently unconfirmable plan" standard in Eight Circuit for objection to disclosure statement. | 2.40 | |
| 03/13/24 | OM | 113 | Correspondence with M. Savetsky re: "patently unconfirmable plan" standard in Eighth Circuit. | 0.10 | |
| 03/13/24 | OM | 113 | Correspondence with M. Savetsky re: third-party release research. | 0.10 | |
| 03/14/24 | BM | 113 | Analysis regarding updated waterfall analysis and potential settlement with bondholders and pension committee. | 1.30 | |
| 03/14/24 | BM | 113 | Call with Pension Committee professionals regarding plan issues. | 0.80 | |
| 03/14/24 | AHS | 113 | Call with counsel for pension committee re: plan issues and follow up re: information request and preparation for upcoming conference. | 0.80 | |
| 03/14/24 | JT | 113 | Review disclosure statement and plan for objection purposes. | 1.20 | |
| 03/14/24 | MS | 113 | Draft disclosure statement objection. | 2.50 | |
| 03/14/24 | MS | 113 | Emails with J. Teele and O. Matviyishyn re: disclosure statement objection. | 0.10 | |
| 03/14/24 | OM | 113 | Follow up research re: "patently unconfirmable plan" pursuant to further instructions from M. Savetsky. | 1.40 | |
| 03/15/24 | BM | 113 | Prepare for settlement conference. | 1.20 | |

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| 03/17/24 | BM | 113 | Attend to preparation for settlement conference. | 1.10 | |
| 03/17/24 | AHS | 113 | Review of materials and leadings and prepare for court conference. | 1.40 | |
| 03/18/24 | BM | 113 | Analysis regarding a potential settlement with pension committee. | 1.20 | |
| 03/18/24 | BM | 113 | Attend settlement conference. | 5.80 | |
| 03/18/24 | AHS | 113 | Attend court conference re: plan and disclosure statement issues. | 5.80 | |
| 03/18/24 | MS | 113 | Draft disclosure statement objection. | 3.20 | |
| 03/18/24 | MS | 113 | Call with B. Mankovetskiy re: court conference re: plan and objections to disclosure statement and final cash collateral order. | 0.10 | |
| 03/19/24 | BM | 113 | Analysis regarding potential plan settlement structure with pensioners committee. | 0.90 | |
| 03/19/24 | BM | 113 | Analysis regarding projected updated waterfall. | 0.60 | |
| 03/19/24 | BM | 113 | Analysis regarding potential alternative settlement structures with bondholders. | 1.30 | |
| 03/19/24 | BM | 113 | Call with Debtors, Pension Committee and Preston Hollow regarding plan issues. | 0.50 | |
| 03/19/24 | AHS | 113 | Analysis re: plan and possible settlement issues and call with counsel for pension committee re: same. | 0.80 | |
| 03/19/24 | AHS | 113 | Call with parties re: plan settlement. | 0.50 | |
| 03/19/24 | JT | 113 | Review/revise disclosure statement objection. | 1.10 | |

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| 03/19/24 | JT | 113 | Discuss yesterday's mediation with B. Mankovetskiy. | 0.30 | |
| 03/19/24 | MS | 113 | Confer with B. Mankovetskiy re: settlement discussions with Master Trustee and Preston Hollow and next steps. | 0.10 | |
| 03/19/24 | MS | 113 | Continue drafting disclosure statement objection. | 2.60 | |
| 03/19/24 | OM | 113 | Research substantive consolidation under Eighth Circuit law for use in disclosure statement objection. | 1.60 | |
| 03/19/24 | OM | 113 | Research "good faith" standard under Eighth Circuit law for use in disclosure statement objection. | 1.30 | |
| 03/19/24 | OM | 113 | Further correspondence with M. Savetsky re: substantive consolidation and "good faith" of plan research. | 0.10 | |
| 03/19/24 | OM | 113 | Correspondence with M. Savetsky re: research pertaining to "good faith" filing of plan and substantive consolidation for the disclosure statement objection. | 0.20 | |
| 03/19/24 | OM | 113 | Draft research summaries of "good faith" and substantive consolidation standards in Eighth Circuit and provide to M. Savetsky. | 0.50 | |
| 03/20/24 | BM | 113 | Analysis regarding potential resolution of plan objections. | 1.10 | |
| 03/20/24 | BM | 113 | Analysis regarding objection to disclosure statement. | 1.40 | |
| 03/20/24 | MS | 113 | Review email from B. Mankovetskiy re: upcoming deadlines. | 0.10 | |
| 03/20/24 | MS | 113 | Continue drafting disclosure statement objection. | 6.60 | |

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|----------|-----|-----|---|-------|--------|
| 03/20/24 | MS | 113 | Legal research re: disclosure statement objection. | 0.70 | |
| 03/20/24 | MS | 113 | Confer with B. Mankovetskiy re: disclosure statement objection. | 0.20 | |
| 03/21/24 | BM | 113 | Call with FTI regarding bondholders' settlement proposal. | 0.30 | |
| 03/21/24 | BM | 113 | Call with Committee chair regarding plan issues. | 0.30 | |
| 03/21/24 | BM | 113 | Analysis regarding bondholders' proposed revised plan of liquidation. | 1.20 | |
| 03/21/24 | AHS | 113 | Review and analysis of plan as circulated by counsel for Preston Hollow. | 0.80 | |
| 03/21/24 | AHS | 113 | Calls with counsel for PH and FTI re: plan as revised and economics of plan. | 0.70 | |
| 03/21/24 | JT | 113 | Review updated disclosure statement objection. | 0.70 | |
| 03/21/24 | MS | 113 | Call with B. Mankovetskiy re: settlement discussions with Master Trustee re: plan. | 0.10 | |
| 03/21/24 | MS | 113 | Review and revise disclosure statement objection. | 4.00 | |
| 03/21/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: disclosure statement objection. | 0.10 | |
| 03/21/24 | MS | 113 | Review Master Trustee's proposed revisions to plan. | 0.40 | |
| 03/22/24 | BM | 113 | Analysis regarding potential global plan settlement. | 1.10 | |
| 03/22/24 | BM | 113 | Analysis regarding revisions of proposed plan of liquidation in connection with potential settlement. | 1.30 | |
| 03/22/24 | BM | 113 | Analysis regarding Debtors' filed plan supplement. | 0.40 | |

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| 03/22/24 | AHS | 113 | Calls with counsel for Preston Hollow and counsel for Debtors re: plan issues. | 0.80 | |
| 03/22/24 | AHS | 113 | Email to committee re: plan status, draft objections to disclosure statement, distribution motion and draft challenge complaint. | 0.50 | |
| 03/22/24 | AHS | 113 | Review of draft objection to disclosure statement, challenge complaint, objection to distribution motion and objection to cash collateral. | 0.90 | |
| 03/22/24 | AHS | 113 | Calls with FTI re: plan and term sheet issues and possible counter proposal. | 0.40 | |
| 03/22/24 | GAK | 113 | Review liquidation analysis. | 0.20 | |
| 03/22/24 | GAK | 113 | Communications with A. Sherman regarding Foundation matters. | 0.10 | |
| 03/22/24 | MS | 113 | Review and further revise Bondholders' draft proposed amended plan. | 2.70 | |
| 03/22/24 | MS | 113 | Call with B. Mankovetskiy re: settlement discussions and revisions to plan. | 0.40 | |
| 03/24/24 | AHS | 113 | Email to parties and follow up on progress re: plan and disclosure statement negotiations. | 0.40 | |
| 03/24/24 | MS | 113 | Review liquidation analysis filed by Debtors. | 0.30 | |
| 03/25/24 | BM | 113 | Call with FTI regarding status of plan negotiations. | 0.30 | |
| 03/25/24 | BM | 113 | Call with Debtors' counsel regarding plan issues. | 0.20 | |
| 03/25/24 | BM | 113 | Call with Pension Committee's counsel regarding plan issues. | 0.20 | |

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| 03/25/24 | BM | 113 | Analysis regarding objection to disclosure statement. | 1.60 | |
| 03/25/24 | BM | 113 | Call with Bondholders' and Debtors' professionals regarding plan issues. | 0.60 | |
| 03/25/24 | AHS | 113 | Attend creditors' committee re: plan issues. | 0.50 | |
| 03/25/24 | AHS | 113 | Call with FTI in advance of committee meeting re: plan issues. | 0.30 | |
| 03/25/24 | AHS | 113 | Review, revise and finalize objection to disclosure statement, objection re: cash collateral, objection re: motion to distribute and challenge complaint. | 1.40 | |
| 03/25/24 | AHS | 113 | Call with all parties re: plan, DS and potential settlement of issues. | 0.60 | |
| 03/25/24 | AHS | 113 | Emails with Debtors' counsel re: plan and DS issues. | 0.30 | |
| 03/25/24 | AHS | 113 | Call with counsel for pension committee re: plan and DS issues. | 0.40 | |
| 03/25/24 | MS | 113 | Confer with B. Mankovetskiy re: disclosure statement and plan issues and preparation for disclosure statement hearing. | 0.20 | |
| 03/25/24 | MS | 113 | Review and prepare documents for disclosure statement hearing. | 0.40 | |
| 03/25/24 | MS | 113 | Review disclosure statement re: potential litigation claim disclosures and draft email to A. Sherman re: same. | 0.20 | |
| 03/26/24 | BM | 113 | Discussions with Pensioners' Committee's counsel regarding potential plan settlement. | 0.40 | |

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| 03/26/24 | BM | 113 | Analysis regarding potential settlement of Committee's objections to disclosure statement. | 1.10 | |
| 03/26/24 | BM | 113 | Call with Debtors' and Bondholders' professionals regarding potential plan settlement. | 0.40 | |
| 03/26/24 | BM | 113 | Analysis regarding bondholders' plan settlement proposal. | 1.30 | |
| 03/26/24 | BM | 113 | Attend to preparation for contested disclosure statement hearing. | 2.20 | |
| 03/26/24 | AHS | 113 | Negotiate DS objections with parties, calls and emails re: same. | 2.20 | |
| 03/26/24 | MS | 113 | Email to B. Mankovetskiy re: Bondholders' draft proposed amended plan. | 0.10 | |
| 03/26/24 | MS | 113 | Review and further revise markup of Bondholders' draft proposed amended plan to address settlement with Committee. | 0.90 | |
| 03/26/24 | MS | 113 | Finalize email to Committee re: bondholder's revised settlement offer. | 0.20 | |
| 03/26/24 | MS | 113 | Calls with B. Mankovetskiy re: bondholder's revised settlement offer and review same. | 0.30 | |
| 03/26/24 | MS | 113 | Review United States Trustee's objection and other objections to disclosure statement/plan. | 0.20 | |
| 03/27/24 | BM | 113 | Attend plan settlement discussions with Debtors', Bondholders' and Pensioners Committee's professionals. | 5.20 | |

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| 03/27/24 | BM | 113 | Attend hearing on motion to approve disclosure statement and related matters. | 1.30 | |
| 03/27/24 | AHS | 113 | Meetings with parties in advance of hearing to resolve issues regarding DS and plan. | 2.80 | |
| 03/27/24 | AHS | 113 | Prepare for and hearing re: DS approval and follow up with client re: same. | 1.40 | |
| 03/27/24 | MS | 113 | Review emails from A. Sherman and Committee members re: plan settlement negotiations. | 0.10 | |
| 03/27/24 | MS | 113 | Review plan and stipulation re: treatment of Altera claims. | 0.20 | |
| 03/27/24 | MS | 113 | Call with B. Mankovetskiy re: settlement and revisions to plan. | 0.10 | |
| 03/27/24 | MS | 113 | Review revised draft amended combined plan and disclosure statement and further comment on same. | 3.30 | |
| 03/28/24 | BM | 113 | Analysis regarding advance distribution to Pension Plan under the proposed plan of liquidation. | 0.80 | |
| 03/28/24 | BM | 113 | Analysis and revisions of proposed amended plan and disclosure statement. | 1.90 | |
| 03/28/24 | AHS | 113 | Review and revise plan and DS and have circulated. | 0.80 | |
| 03/28/24 | AHS | 113 | Calls with parties re: plan issues and proposed changes to plan. | 0.60 | |
| 03/28/24 | AHS | 113 | Email to Committee re: plan status and revisions and call with chairperson re: same. | 0.50 | |
| 03/28/24 | AHS | 113 | Call with FTI re: pension claim and distribution issues. | 0.20 | |

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| 03/28/24 | AHS | 113 | Further emails with the parties re: plan and deadline issues. | 0.30 | |
| 03/28/24 | MS | 113 | Call with N. Ganti, J. Park. A. Sherman and B. Mankovetskiy re: plan issues. | 0.30 | |
| 03/28/24 | MS | 113 | Draft Committee letter to unsecured creditors in support of plan. | 1.00 | |
| 03/28/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: further revised draft amended plan. | 0.10 | |
| 03/28/24 | MS | 113 | Review emails from M. Preusker, D. Simon and E. Keil re: further revised draft amended plan. | 0.10 | |
| 03/28/24 | MS | 113 | Review further revised draft amended plan. | 0.30 | |
| 03/28/24 | MS | 113 | Further review and revise draft amended plan. | 3.20 | |
| 03/28/24 | MS | 113 | Emails with B. Mankovetskiy re: draft amended plan. | 0.40 | |
| 03/28/24 | MS | 113 | Calls with B. Mankovetskiy re: revisions to draft amended plan. | 0.40 | |
| 03/28/24 | MS | 113 | Review bondholder comments on draft amended plan. | 0.30 | |
| 03/29/24 | BM | 113 | Analysis and revisions of proposed amended plan and disclosure statement. | 1.80 | |
| 03/29/24 | BM | 113 | Analysis and revisions of Committee letter in support of plan confirmation. | 0.70 | |
| 03/29/24 | BM | 113 | Analysis regarding advance distribution to Pension Plan. | 0.70 | |
| 03/29/24 | BM | 113 | Analysis regarding form of order approving disclosure statement and related relief. | 0.80 | |

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| 03/29/24 | AHS | 113 | Emails with parties to address further plan issues and revisions. | 0.80 | |
| 03/29/24 | AHS | 113 | Review and revise plan as circulated and address proposed changes. | 0.90 | |
| 03/29/24 | AHS | 113 | Emails with committee and members re: open plan issues. | 0.50 | |
| 03/29/24 | AHS | 113 | Emails with FTI re: plan and pension issues. | 0.40 | |
| 03/29/24 | AHS | 113 | Review and revise plan support letter as requested and have same circulated. | 0.60 | |
| 03/29/24 | GAK | 113 | Review Plan and DS objections. | 0.20 | |
| 03/29/24 | MS | 113 | Review emails from P. Roby, M. Preusker and E. Keil re: plan revisions. | 0.30 | |
| 03/29/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: plan revisions. | 0.40 | |
| 03/29/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: revisions to disclosure statement order. | 0.30 | |
| 03/29/24 | MS | 113 | Emails with A. Sherman re: revisions to Committee plan support letter. | 0.20 | |
| 03/29/24 | MS | 113 | Review and revise Committee plan support letter to incorporate various committee member comments. | 0.80 | |
| 03/29/24 | MS | 113 | Emails with D. Simon and E. Keil re: revised plan, disclosure statement order, and committee plan support letter. | 0.30 | |
| 03/29/24 | MS | 113 | Review revisions to first amended plan. | 0.40 | |
| 03/29/24 | MS | 113 | Review revisions to disclosure statement order and exhibits. | 0.40 | |

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| 03/29/24 | MS | 113 | Call with N. Ganti re: pension claim distributions and emails with N. Ganti re: same. | 0.20 | |
| 03/29/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: pension claim distributions and call with B. Mankovetskiy re: same. | 0.20 | |
| 03/29/24 | MS | 113 | Emails with A. Sherman and B. Mankovetskiy re: pension plan reserve and true up issues. | 0.40 | |
| 03/29/24 | MS | 113 | Review pension plan provisions re: plan reserve and true up issues. | 0.20 | |
| TASK TOTAL 113 | | | | <u>180.40</u> | <u>\$159,996.00</u> |

114 – RELIEF FROM STAY PROCEEDINGS

| | | | | | |
|----------|----|-----|---|------|--|
| 03/13/24 | MS | 114 | Review motion for relief from stay filed by Iowa City Ambulatory Surgical Center. | 0.30 | |
| 03/15/24 | MS | 114 | Review and revise objection to Secured Bondholders motion for distribution of sale proceeds. | 5.20 | |
| 03/19/24 | MS | 114 | Review and revise objection to Secured Bondholders motion for distribution of sale proceeds. | 2.20 | |
| 03/19/24 | MS | 114 | Call with B. Mankovetskiy re: objection to Secured Bondholders motion for distribution of sale proceeds and emails with B. Mankovetskiy re: same. | 0.20 | |

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| 03/29/24 | AHS | 114 | Emails re: ASC issues, review form of order and attend hearing re: same. | 0.40 | |
| TASK TOTAL 114 | | | | 8.30 | \$7,026.50 |
| 116 – TRAVEL (billed at 50%) | | | | | |
| 03/17/24 | AHS | 116 | Travel from Newark to Cedar Rapids. (4.00) | 2.00 | |
| 03/18/24 | AHS | 116 | Travel from Cedar Rapids to Newark. (4.00) | 2.00 | |
| 03/26/24 | BM | 116 | Travel to Iowa for disclosure statement hearing. (4.00) | 2.00 | |
| 03/26/24 | AHS | 116 | Travel from Newark to Cedar Rapids. (4.00) | 2.00 | |
| 03/27/24 | BM | 116 | Travel from Iowa in connection with hearing on disclosure statement. (4.00) | 2.00 | |
| 03/27/24 | AHS | 116 | Travel from Cedar Rapids to Newark. (4.00) | 2.00 | |
| TASK TOTAL 116 | | | | 12.00 | \$12,300.00 |
| TOTAL FEES at Standard Rates | | | | 266.90 | \$228,338.50 |
| Attorney Fees at Blended Rate of \$675 | | | | 266.90 | \$180,157.50 |
| Paralegal Fees at Standard Rate | | | | 0.00 | 0.00 |
| TOTAL FEES at Blended Rate | | | | 266.90 | \$180,157.50 |

TASK CODE SUMMARY

| | | | |
|-----|--------------------------------------|-------|------------|
| 101 | Asset Analysis and Recovery | 0.70 | \$647.50 |
| 102 | Asset Disposition | 7.60 | \$6,879.00 |
| 104 | Case Administration | 5.40 | \$4,077.00 |
| 105 | Claims Administration and Objections | 2.10 | \$1,927.50 |
| 107 | Fee/Employment Applications | 15.90 | \$9,979.50 |
| 108 | Fee/Employment Objections | 0.50 | \$387.50 |

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| | | | |
|--|---|--------|--------------|
| 109 | Financing | 17.60 | \$12,692.00 |
| 110 | Litigation (Other than Avoidance Action Litigation) | 16.40 | \$12,426.00 |
| 113 | Plan and Disclosure Statement | 180.40 | \$159,996.00 |
| 114 | Relief from Stay Proceedings | 8.30 | \$7,026.50 |
| 116 | Travel (billed at 50%) | 12.00 | \$12,300.00 |
| TOTAL FEES at Standard Rates | | 266.90 | \$228,338.50 |
| Attorney Fees at Blended Rate of \$675 | | 266.90 | \$180,157.50 |
| Paralegal Fees at Standard Rate | | 0.00 | 0.00 |
| TOTAL FEES at Blended Rate | | 266.90 | \$180,157.50 |

| | | | | | |
|--------------------|-------|---|------------|---|-------------|
| Andrew H. Sherman | 43.60 | x | \$1,075.00 | = | \$46,870.00 |
| Boris Mankovetskiy | 75.30 | x | \$925.00 | = | \$69,652.50 |
| Jason Teele | 16.20 | x | \$895.00 | = | \$14,499.00 |
| Michael Savetsky | 92.20 | x | \$835.00 | = | \$76,987.00 |
| Gregory A. Kopacz | 10.00 | x | \$775.00 | = | \$7,750.00 |
| Oleh Matviyishyn | 29.60 | x | \$425.00 | = | \$12,580.00 |

DISBURSEMENT DETAIL

| | | | |
|----------|-----|--|----------|
| 01/10/24 | 291 | Airfare (Flight to hearing in Cedar Rapids – AHS) | \$518.33 |
| 01/10/24 | 291 | Airfare (Flight to hearing in Cedar Rapids – BM) | \$518.33 |
| 01/21/24 | 382 | Meals (Attend hearing in Cedar Rapids – AHS) | \$14.76 |
| 01/21/24 | 382 | Meals (Attend hearing in Cedar Rapids – AHS) | \$5.66 |
| 01/21/24 | 293 | Lodging (Attend hearing in Cedar Rapids – AHS) | \$121.98 |
| 01/21/24 | 293 | Lodging (Attend hearing in Cedar Rapids – BM) | \$121.98 |
| 01/21/24 | 291 | Airfare (Flight from hearing in Cedar Rapids – AHS) | \$300.10 |
| 01/21/24 | 291 | Airfare (Flight from hearing in Cedar Rapids – BM) | \$300.10 |
| 01/22/24 | 382 | Meals (Attend hearing in Cedar Rapids – AHS) | \$17.98 |
| 01/22/24 | 382 | Meals (Attend hearing in Cedar Rapids – AHS) | \$49.38 |
| 01/22/24 | 294 | Car Rental (Attend hearing in Cedar Rapids) | \$225.47 |
| 01/22/24 | 297 | Miscellaneous Travel (gas) (Attend hearing in Cedar Rapids) | \$29.15 |
| 01/22/24 | 295 | Parking (Attend hearing in Cedar Rapids) | \$73.66 |
| 01/22/24 | 296 | Tolls (Attend hearing in Cedar Rapids) | \$9.99 |
| 03/17/24 | 382 | Meals (Attend settlement conference in Cedar Rapids – AHS) | \$11.50 |
| 03/17/24 | 382 | Meals (Attend settlement conference in Cedar Rapids – AHS) | \$60.81 |
| 03/17/24 | 293 | Lodging (Attend settlement conference in Cedar Rapids – AHS) | \$148.86 |

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| | | | |
|----------|-----|---|------------|
| 03/17/24 | 293 | Lodging (Attend settlement conference in Cedar Rapids – BM) | \$148.86 |
| 03/17/24 | 291 | Airfare (Attend settlement conference in Cedar Rapids – AHS) | \$1,300.22 |
| 03/17/24 | 291 | Airfare (Attend settlement conference in Cedar Rapids – BM) | \$1,300.22 |
| 03/18/24 | 382 | Meals (Attend settlement conference in Cedar Rapids – AHS/BM) | \$82.58 |
| 03/18/24 | 382 | Meals (Attend settlement conference in Cedar Rapids – AHS) | \$18.54 |
| 03/18/24 | 294 | Car Rental (Attend settlement conference in Cedar Rapids) | \$50.80 |
| 03/05/24 | 358 | Pacer | \$3.00 |
| 03/05/24 | 358 | Pacer | \$0.80 |
| 03/05/24 | 358 | Pacer | \$1.00 |
| 03/18/24 | 358 | Pacer | \$3.00 |
| 03/18/24 | 358 | Pacer | \$3.00 |
| 03/22/24 | 358 | Pacer | \$0.10 |
| 03/22/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$3.00 |
| 03/23/24 | 358 | Pacer | \$0.60 |
| 03/23/24 | 358 | Pacer | \$0.50 |
| 03/23/24 | 358 | Pacer | \$0.30 |
| 03/23/24 | 358 | Pacer | \$0.50 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.90 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$2.90 |
| 03/23/24 | 358 | Pacer | \$2.90 |
| 03/23/24 | 358 | Pacer | \$1.00 |
| 03/23/24 | 358 | Pacer | \$0.20 |
| 03/23/24 | 358 | Pacer | \$0.50 |
| 03/23/24 | 358 | Pacer | \$0.60 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.40 |
| 03/23/24 | 358 | Pacer | \$0.60 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.50 |
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$0.40 |

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| | | | |
|----------------------------|-----|-------|-------------------|
| 03/23/24 | 358 | Pacer | \$0.10 |
| 03/23/24 | 358 | Pacer | \$2.90 |
| TOTAL DISBURSEMENTS | | | \$5,459.76 |

| INVOICE SUMMARY | |
|---------------------------|----------------------|
| Total Fees | \$180,157.50 |
| Total Disbursements | \$5,459.76 |
| TOTAL THIS INVOICE | \$185,617.26* |

*Total includes fees at **Blended Rate**. Per Retention Application, lesser of fees at **Standard Rates (\$228,338.50)** and fees at **Blended Rate** of \$675 (**\$180,157.50**)** apply.

**includes paralegal fees at standard rates, if applicable